

PROGRESS REPORT NO. 130

TO: Laura Buelow, U.S. Environmental Protection Agency (EPA) – via Email

Kathryn Cerise, EPA – via Email

FROM: Kris McCaig – Teck American Incorporated (TAI)

DATE: May 5, 2017 **FILE NO:** 01-773180-000

RE: Upper Columbia River (UCR) Remedial Investigation/Feasibility Study

(RI/FS) - Progress Report No. 130 Month Ending April 2017

Pursuant to Paragraph 39 of the June 2, 2006 Settlement Agreement (Agreement), the following is intended to provide a summary of activities completed during the past month in compliance with the aforementioned Agreement. It is also intended to provide a brief summary of pending and on-going activities.

Phase 2 Sediment Study – At the time of writing TAI received a letter from EPA dated May 1, 2017 providing EPA's approval of the Draft Final Phase 2 Sediment Study Data Summary and Data Gap Report (dated April 7, 2017).

Sediments – TAI is in receipt of a letter from EPA dated December 14, 2016 in which EPA presented a Statement of Finding (SOF) the Agency used to draw conclusions about risk to the benthic community in a portion of the UCR Site. A technical meeting was held on January 31, 2017 to discuss the SOF and associated data. Follow-up discussions between the EPA and TAI Project Managers occurred in February and a result, a second technical meeting was scheduled for June 7, 2017.

Benthic Macroinvertebrate Tissue Study – The laboratory started processing the mussel and crayfish samples to create composites at the beginning of April. EPA visited the lab with TAI's consultant on April 7, 2017 to observe. EPA and TAI agreed on deadlines for submittal of validated data and the draft data summary report (DSR) of July 14, and September 14, 2017, respectively. EPA delivered a revised version of the quality assurance project plan (QAPP) for the BMI Tissue Study split sample analysis on April 24, 2017 and TAI is reviewing.

Recreation Consumption and Resource Use Survey – EPA provided the Draft Final Data Analysis Report (DAR) for the Recreational Use Survey to TAI on April 15, 2016 and TAI submitted review comments to EPA on June 10, 2016. TAI has postponed its review

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of the November 23, 2015 Memorandum written by SRC titled "Recreation Use Survey Fish Ingestion Rate" given that the memorandum referenced the following version of the DAR for the recreational use survey: "SRC, Inc. (2014). Data analysis report for the recreational use survey for the Upper Columbia River Site human health risk assessment and remedial investigation/feasibility study. Prepared under contract for the Environmental Protection Agency. January 16."

Tribal Consumption and Resource Use Survey – On June 27, 2016 EPA submitted the April 30, 2016 report titled "Statistical Review of a Report on Food Consumption and Resource Use among Residents of the Colville Reservation" as prepared by The Mountain-Whisper-Light Statistics for TAI to review and provide comment. TAI provided review comments to EPA on September 26, 2016.

2016 Residential Soil Sampling – TAI delivered the draft DSR to EPA on March 30, 2017. TAI sent results letters out on April 19, 2017 to landowners who had soil sampling conducted on their property for the 2016 study.

White Sturgeon Sediment Toxicity Study – In January 2014 TAI submitted to EPA, the draft final version of the Assessment of Sediment Toxicity to White Sturgeon DSR and response to EPA's comments. On August 10, 2015 TAI met with EPA to discuss the draft final DSR and TAI's response to comments and clarify further changes needed in order to revise the DSR. TAI submitted a revised DSR and revised response to comments to EPA on November 20, 2015.

Soil Amendment Technologies Evaluation Study (SATES) – On February 22, 2017 a study kick-off meeting was held in Seattle, WA with EPA, Teck and the Participating Parties to review the study plan including objectives, approach, scope elements and phasing. On March 31, 2017 TAI distributed a Phase I Work Plan Outline, Work Plan Contribution Organization Chart and Schedule to the SATES Work Plan Team for review and input. A spring technical and siting meeting was planned for May 9, 2017.

Analytical Support for Sturgeon Sampling Effort – The nine sturgeon fillet composite samples were processed and analyzed, data were validated, and the final validated data and validation reports were uploaded to the UCR RI/FS database web tool on February 6, 2017. TAI delivered the draft White Sturgeon Tissue Study DSR to EPA on February 21, 2017. EPA delivered a revised version of the Field Summary Report on March 30, 2017 and TAI is reviewing.

Assessment and Estimations of Upland Soils on the UCR Site (background soil study) – Informal dispute resolution discussions continued in the month of April. Agreements by EPA and TAI to extend informal dispute occurred twice during the month (April 19 to April 28, 2017 and April 28 to May 31, 2017) and were documented in letters from EPA to TAI dated April 19 and April 28, 2017 respectively.

Plant Tissue Study – Informal dispute resolution discussions continued in the month of April. Agreements by EPA and TAI to extend informal dispute occurred twice during the month (April 19 to April 28, 2017 and April 28 to May 31, 2017) and were documented in letters from EPA to TAI dated April 19 and April 28, 2017 respectively.

Delineation of Upland Aerial Footprint Reflecting Atmospheric Deposition of Trail Facility Emissions – TAI requested and EPA agreed that a meeting to discuss a delineation/footprint study will occur before the above reference background soil and plant tissue studies proceed. The meeting took place on February 1, 2017. EPA and TAI are evaluating the information that was presented during the meeting.

Baseline ecological risk assessment (BERA) – a toxicity reference value (TRV) development webinars was held between EPA and TAI on April 18, 2017 for fish dietary TRVs. Follow on wildlife and soil background and bioavailability occurred during the month of April. At the time of writing, a webinar for and sediment and porewater TRV development occurred on May 1, 2017 and a second webinar on this topic has been scheduled for May 12, 2017.

Should you have any questions or require any additional information, please do not hesitate to contact me at 509-623-4501.